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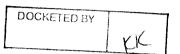
## RECEIVED BEFORE THE ARIZONA CORPORATION COMMISSION

1 2007 SEP 19 P 12: 26 2 **COMMISSIONERS** MIKE GLEASON, Chairmand CORP COMMISSION 3 WILLIAM A. MUNDELL 4 JEFF HATCH-MILLER KRISTIN K. MAYES 5 **GARY PIERCE** 6 In the matter of: 7 EDWARD A. PURVIS and MAUREEN H. 8 PURVIS, husband and wife 9 1231 W. Shannon Chandler, Arizona 85224 GREGG L. WOLFE and ALLISON A. WOLFE, husband and wife 2092 W. Dublin Lane Chandler, Arizona 85224 NAKAMI CHI GROUP MINISTRIES INTERNATIONAL, (a/k/a NCGMI), a Nevada corporation sole 4400 N. Scottsdale Road, Suite 9-231 Scottsdale, Arizona 85251 JAMES W. KEATON, Jr. and JENNIFER KEATON, husband and wife 11398 E. Whitehorn Drive, Apt. D Scottsdale, Arizona 85255 18 ACI HOLDINGS, INC., a Nevada corporation 17650 N. 25th Avenue 19 Phoenix, Arizona 85023

Respondents.

Arizona Corporation Commission DOCKETED

SEP 19 2007



Docket No. S-20482A-06-0631

**PURVIS' REPLY IN SUPPORT** OF NOTICE FOR SUBPOENAS

**AND** 

RESPONSE TO MOTION TO SET **DEADLINES** 

## MEMORANDUM OF POINTS AND AUTHORITIES

The Securities Division's response to the Notice of Request for Issuance of Subpoenas is moot. The subpoenas have already been issued. However, certain inaccuracies in the Division's response need to be corrected.

First, the Division did not respond to undersigned counsel's repeated e-mail

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requests for access to the Keating/ACI/CSI documents. Undersigned counsel sent many 1 emails to the Division's counsel on the issue, and no response was received before the 2 Notice was filed. It appears that the Division chose to ignore the emails and respond by 3 letter, which was mailed (rather than sent by email of fax) to undersigned counsel. Of 4 5 course, this letter did not arrive until after the subpoenas had been submitted. Moreover and more importantly, the Division's offer to produce documents is 6 materially deficient. The Division admits that it has unilaterally redacted information 7 8 from the documents. This cannot be countenanced. 9 Regarding the motion to set deadlines, again this issue has been mooted by the 10 schedule set forth by the ALJ. RESPECTFULLY SUBMITTED this 19th day of September 2007. 11 OUARLES & BRADY LLP 12 Renaissance One, Two North Central Avenue Phoenix, Arizona 85004-2391 13 14 15 John Maston O Zachary Cain 16 Attorneys for Respondents 17 Edward A. Purvis and Maureen H. Purvis 18 ORIGINAL and 13 COPIES filed this 19th day of September, 2007, with: 19 **Docket Control** 20 Arizona Corporation Commission 1200 West Washington 21 Phoenix, Arizona 85007 22 **COPY** of the foregoing faxed and mailed this 19th day of September, 2007, to: 23 Mattew Neubert 24 Securities Division Arizona Corporation Commission 25 1200 West Washington Phoenix, Arizona §5007 26

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